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for Liberty Institute

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

**IRANIAN AMERICANS FOR
LIBERTY INSTITUTE**, a Delaware
exempt corporation,

Plaintiff,

v.

ALI EBRAHIMZADEH, an
individual, and **JOHN DOES 1-10**,
unknown persons;

Defendants.

Case No. 2:22-cv-09240-MWF-MAR

**DECLARATION OF DANIEL
JAFARI IN SUPPORT OF
PLAINTIFF IRANIAN
AMERICANS FOR LIBERTY
INSTITUTE'S REPLY BRIEF IN
SUPPORT OF MOTION
PURSUANT TO RULE 56(d) TO
PERMIT DISCOVERY AND
DENY OR DEFER
CONSIDERATION OF
DEFENDANT ALI
EBRAHIMZADEH'S SPECIAL
MOTION TO STRIKE**

Judge: Hon. Michael W. Fitzgerald

Ctrm: 5A

Date: March 13, 2023

Time: 10:00 a.m.

1 I, Daniel Jafari, declare:

2 1. I am the President of the non-profit organization, Iranian Americans for
 3 Liberty (“IAL”), the plaintiff in this action. Unless otherwise stated, I have personal
 4 knowledge of the facts set forth in this declaration.

5 2. I submit this declaration in direct response to arguments raised by
 6 Defendant Ali Ebrahimzadeh in his opposition to Plaintiff’s Motion Pursuant to Rule
 7 56(d) to Permit Discovery and Deny or Defer Consideration of Defendant Ali
 8 Ebrahimzadeh’s Special Motion to Strike.

9 3. I am a native speaker of the Persian language, and I am fluent in both
 10 written and spoken Persian.

11 4. Lodged with the Court as **Exhibit A** is thumb drive containing a video
 12 of Masih Alinejad, which was published on Twitter at the following URL:

- 13 • [https://twitter.com/ProSHaHansHaaHi/status/1568719711281504256?t=h](https://twitter.com/ProSHaHansHaaHi/status/1568719711281504256?t=hQhO39sC0SyamUqbor2kwQ&s=19)
 14 [QhO39sC0SyamUqbor2kwQ&s=19](https://twitter.com/ProSHaHansHaaHi/status/1568719711281504256?t=hQhO39sC0SyamUqbor2kwQ&s=19)

15 **Exhibit A** was downloaded from Twitter on February 22, 2023. Alinejad’s oral
 16 statements in **Exhibit A** translate to the following:

17 "I love you, Ali Ebrahimzadeh, Sam Rajabi, I love Ashoo, I love Shasi
 18 or Sashi, who is it in Twitter because when you curse, it is the time that
 19 I am speechless and cannot curse, you curse instead of me, you know
 20 what I mean?!"

21 This content of **Exhibit A** was translated from Persian to English by NLC
 22 Translations. NLC Translations provides professional quality, 100% human-
 23 translated services and is a corporate member of the American Translators
 24 Association. A true and correct copy of the certified translation of **Exhibit A** from
 25 Persian to English is attached hereto as **Exhibit C**.

26 5. Lodged with the Court as **Exhibit B** is thumb drive containing a video
 27 of Masih Alinejad being escorted and/or protected by Ebrahimzadeh among a crowd
 28 of people, which was published on Instagram at the following URL:

- <https://www.instagram.com/reel/CjMMHomJwOf/?igshid=YmMyMTA2M2Y%3D>

Exhibit B was downloaded from Instagram on February 24, 2023.

6. Attached hereto as **Exhibit D** are true and correct screenshots of publicly-available social media posts from Defendant's Instagram profile, which were captured on June 6, 2022 from the below-listed URLs.

- <https://www.instagram.com/p/CNG7-qzH4bM/?igshid=YmMyMTA2M2Y%3D>
- <https://www.instagram.com/p/CRVihSgHNsC/?igshid=YmMyMTA2M2Y%3D>
- <https://www.instagram.com/p/Ca7bjAWLuFe/?igshid=YmMyMTA2M2Y%3D>

Exhibit D identifies the dates and URLs of the screen captures. **Exhibit D** also contains certified translations of the social media posts from Persian to English by NLC Translations.

7. I have executed this declaration within the United States.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

Date: February 24, 2023


Daniel Jafari

Exhibit A

Nonpaper Physical Exhibit Lodged with Court Pursuant to L.R. 11-5.1.



Exhibit B

Nonpaper Physical Exhibit Lodged with Court Pursuant to L.R. 11-5.1.

Exhibit C


<https://twitter.com/proshahanshaahi/status/1568719711281504256?s=46&t= IFhzcMPkcak3ZKI0O6cZ>
Q

← Thread

 **Manouchehr Bekhradi** 
@ProSHaHansHaaHi

خانم مسیح علی نژاد رو به هواداران فحاششون: «...وقتهایی که خودم کم می آرم و نمی تونم فحش بدم، شماها جای من فحش می دین... (لیخند رضایت مسیح علی نژاد از حامیان فحاششون)»
@AlinejadMasih
@nadersadighi1
@FoadPashaei
@IranIntl

Translate Tweet



15.6K views 0:00 / 0:19

4:54 PM · Sep 10, 2022

Manouchehr Bekhradi 

@ProSHaHansHaaHi

Ms. Masih Alinejad to their foul-mouthed fans: "...when I am weak and can't curse, you swear instead of me..."

@AlinejadMasih

@nadersadighi1

@FoadPashaei

@IranIntl

[Video transcription]:

I love you, Ali Ebrahimzadeh, Sam Rajabi, I love Ashoo, I love Shasi or Sashi, who is it in Twitter because when you curse, it is the time that I am speechless and cannot curse, you curse instead of me, you know what I mean?!

WITH REFERENCE TO THE FOLLOWING MATERIALS/DOCUMENTS, we at NLC Translations LLC, a professional document translation company, confirm that we are accredited and competent to translate the above referenced document(s) and attest that the language translation completed by NLC Translations LLC's certified professional translators, represents an accurate and correct interpretation of the terminology/content of the source document(s). This is to certify the correctness of the translation only. We do not guarantee that the original is a genuine document or that the statements contained in the original document(s) are true.

IN WITNESS WHEREOF, NLC Translations LLC A Member in Good Standing with American Translators Association – Member #272014 has caused the Certificate to be signed by its authorized representative.

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Translated For: Mitra Jashni Company: Iranian Americans for Liberty

Materials Translated:

- Added tweet.docx
- Ali Ebrahimzadeh's links to Masih.docx
- Etemadi's interviews for translation.pdf

Source Language: Farsi

Target Language: English

IN WITNESS WHEREOF, NLC Translations LLC has caused the Certificate to be signed by its authorized representative.

By:

Date: 02/24/2023

David Lopez, Project Manager

A copy of the translated version is attached to this statement of certification.



The American Translators Association – Member in Good Standing

Member #272014



Headquarters: Dallas, Texas | Miami, Florida
Administrative Office: 12895 Josey Lane 124-130 – Farmers Branch, Texas 75234
Phone: 1-833-744-1555 | www.nlctranslations.com

Exhibit D

Evidence of direct contact between Masih Alinejad and Ali Ebrahimzadeh

1. April 1, 2021

<https://www.instagram.com/p/CNG7-qzH4bM/?igshid=YmMyMTA2M2Y=>

The Date of screenshot: June 6, 2022

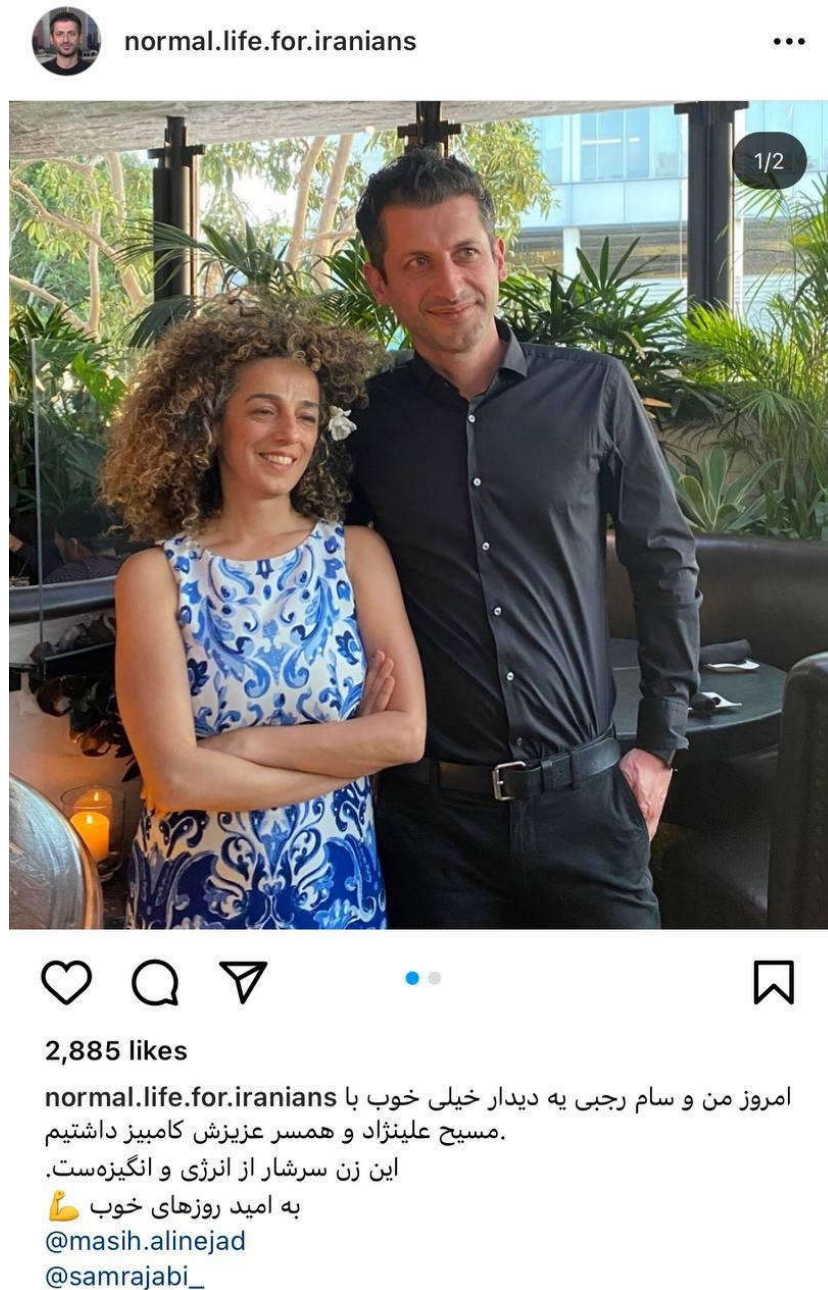


Image 1

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Image 2



image3

normal.life.for.iranians today Sam Rajabi and I had a very nice meeting with Masih Alinejad and her lovely husband dear Kambiz. This woman is full of life. Hoping for better days.

[@masih.alinejad](#)

[@samrajabi](#)

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2. July 15, 2021

<https://www.instagram.com/p/CRVihSgHNsC/?igshid=YmMyMTA2M2Y=>

The Date of screenshot: June 6, 2022



Image 3

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normal.life.for.iranians A few months ago, the first time I talked with Masih Alinjade, the first sentence I told her was:

"Dear Masih, although my experience is negligible compared to yours, I now understand what pressure you tolerate! "

You can't imagine what mental and psychological costs the Islamic Republic causes to political and social activists unless you've been in a similar situation. You certainly can't imagine how you feel when several thousand accounts curse you at the same time.

When religious accounts, reformists, members or supporters of Niac, and cyber groups try by all means to silence your voice.

In these critical moments, you don't give up just because of one reason, the feeling of influencing and giving people hope.

The feeling of creating a positive change in the society and pushing back the oppressor.

Remember that activism against the Islamic Republic is not the same as activism in other countries of the world. Because the Islamic Republic is not like any other dictatorship. You are dealing with a bunch of gangsters, rascals, and villains who have no moral principles. They use every lie to slander you and your discourse. They take your loved ones hostage and come back to physically eliminate you. Now, for just a second, put yourself in Masih's shoes. Apart from the government pressure, she cries several times a day when she contacts grieving and justice-seeking families inside Iran and immediately returns to her stable and fighting state because she knows that she is the only hope for thousands of voiceless people inside Iran.

Kidnapping, and more specifically kidnapping a journalist and human rights activist on United States soil is not a joke. We all are in a war, in a war against the never-ending viciousness of a government. The Islamic Republic is absolute evil and to fight against it, you should use all your power all the time. Be smart and brave. I wrote all these lines to say, dear Masih, we appreciate you in this process of activism in Iran, and we're trying to do our part and take the burden off your shoulders a bit.

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3. March 10, 2022

<https://www.instagram.com/p/Ca7bjAWLuFe/?igshid=YmMyMTA2M2Y=>

The Date of screenshot: June 6, 2022

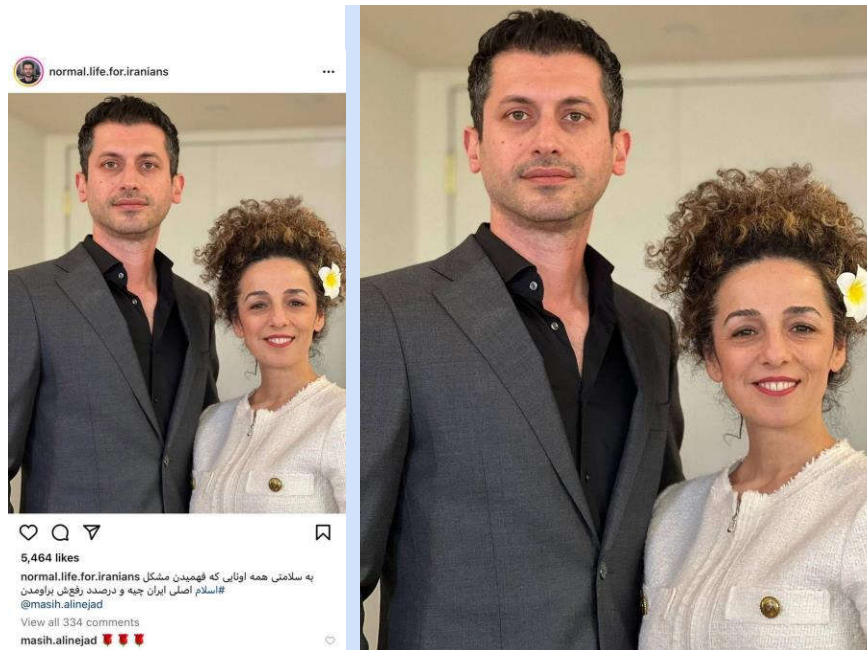


Image 5

image 6

normal.life.for.iranians Cheers to all those who found out what the main problem of Iran is and tried to solve it. [#Islam](#)
[@masih.alinejad](#)

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